

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**

ONLY AL-KHIDHR

PLAINTIFF

VERSUS

CAUSE NO.: 1:07-CV-01223-LG-RHW

**HARRISON COUNTY, MISSISSIPPI, by and through its
Board of Supervisor; HARRISON COUNTY SHERIFF,
George Payne, in his official capacity; SUPERVISOR
OF BOOKING, CAPTAIN RICK GASTON, acting
under of state law; CORRECTIONS OFFICER
SERGEANT RYAN TEEL, acting under
color of state law; CORRECTIONS OFFICER MORGAN
THOMPSON, acting under color of state law; CORRECTIONS
OFFICER THOMAS MOORE, acting under color of state law**

DEFENDANTS

**PLAINTIFF'S AMENDED DESIGNATION
OF EXPERT WITNESSES FOR TRIAL**

COMES NOW, Only Al-Khidhr, the Plaintiff in the above styled and numbered cause, and files this his Plaintiff's Amended Designation of Expert Witnesses for Trial and designates the following expert witnesses whom he anticipates may testify, live or by deposition according to availability at the time of trial.

1. Dr. Simone J. Simone, Clinical Psychologist

Dr. Simone is a licensed psychologist in the state of Mississippi. Dr. Simone's *curriculum vitae* is attached hereto as Exhibit "1" and incorporated by reference. Dr. Simone is expected to testify concerning the effects following torture and/or mistreatment of a detained person in a controlled environment. At this time Dr. Simone's report is unavailable. Plaintiff expects to have an evaluation by Dr. Simone on or about September 28, 2009, with a completed report on or about October 9, 2009. This designation will be supplemented and any and all reports to which Defendants are entitled will be provided.

Dr. Simone's fee schedule is as follows: \$1500 psychological evaluation (including report); \$200 per hour for court appearance; \$1200 retainer as expert witness. The fees do not include expenses.

2. William Drechsel

Mr. William Drechsel was a Sergeant and Director of the Field Training Officer Program for the Harrison County Sheriffs Department. He was primarily assigned to work at the Harrison County Adult Detention Center. His fields of expertise include: Field Training Officer, State Law Enforcement Instructor, in- and out-processing of Inmates, booking procedures and classification of inmates and detainees, C.E.R.T. (Correctional Emergency Response Team) Procedures, use of force and jail/prison accreditation. William Drechsel's *curriculum vitae* (including a list of prior cases in which he has testified or given a deposition as an expert witness) is attached as Exhibit "2" and incorporated by reference. He has provided a written report containing his various opinions and said report is attached hereto and incorporated herein by reference as Exhibit "3". Plaintiff reserves the right to supplement this information as needed.

Mr. Drechsel's fee schedule is as follows: \$3000 expert witness fees, billed at the rate of \$150 per hour for court appearance, \$125 per hour for out-of-court work. His travel is \$50 per hour plus expenses.

3. Thomas H. Christiansen, M.Ed., CRC, CDMS, CLCP, LPC

Mr. Thomas H. Christiansen is currently employed as a vocational consultant with Carlisle and Associates in Mobile, Alabama. He is expected to give testimony regarding the injuries suffered by the Plaintiff and the cost and anticipated effectiveness of rehabilitative

treatment. He may also give testimony about future lost wages. A copy of his *curriculum vitae* is attached as Exhibit "4" and incorporated by reference.

4. Treating Physicians

The Plaintiff may call any and/or all of his treating physicians to testify that the medical treatment rendered was necessary and proper. They may also give an opinion as to prognosis for recovery. No reports have been issued.

RESPECTFULLY SUBMITTED, this the 17th day of September, 2009.

ONLY AL-KHIDHR
Plaintiff

BY: CHASE CHASE & ASSOCIATES, PLLC

BY: */s/Alvin Chase*
ALVIN CHASE (MSB #5968)

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CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that I have this day electronically filed a true and correct copy of Plaintiff's Amended Designation of Expert Witnesses for Trial with the Clerk of Court using the ECF system which sent notification of such filing to the following:

Karen Jobe Young
Meadows Law Firm
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Cyril T. Faneca
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Robert H. Pedersen
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P.O. Box 650
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Dated, this the 17th day of September, 2009.

/s/Alvin Chase
ALVIN CHASE

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